



January 23, 2012

VIA FAX 212-805-6737

Hon. George B. Daniels
United States District Judge
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:
George B. Daniels
George B. Daniels, U.S.D.J.
Dated: JAN 24 2012

Re: *Sokolow et al. v. Palestine Liberation Organization et al.*,
Civ. No. 04-397 (GBD)

Dear Judge Daniels,

We represent plaintiffs in the matter above and we write to request a one-week enlargement of time, until January 30, 2012, to file our opposition to defendants' Motion for Partial Judgment on the Pleadings (DE 186), which is currently due on January 23, 2012. The grounds for this request are as follows:

Plaintiffs' undersigned counsel is also sole counsel for the plaintiffs in the matter of *Wultz v. Islamic Republic of Iran*, Civ. No. 08-01460 (D.D.C.), which is a civil action arising from a terrorist suicide bombing in which Daniel Wultz, an American teenager, was murdered. Late in the day on Friday, January 20, 2012, the *Wultz* court scheduled a trial for the unexpectedly short dates of February 27-28, 2012. As a result, plaintiffs' counsel was plunged over the weekend into intensive trial preparations (involving coordination with multiple witnesses from around the world, arranging for the translation of documents and similar tasks) that will require counsel's full attention for the coming days.

As a result, we respectfully seek a brief enlargement of time to complete and file our opposition to defendants' Motion, until January 30, 2012.

THE BERKMAN LAW OFFICE, LLC

January 23, 2012

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Respectfully submitted,

S/ *Robert J. Tolchin*

Robert J. Tolchin

Counsel for Plaintiffs

Cc: Brian A. Hill, Esq.